



August 10, 2011

VIA ELECTRONIC FILING

Jocelyn Boyd, Chief Clerk / Administrator
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Bonnie D. Shealy
1901 MAIN STREET, SUITE 1200
POST OFFICE BOX 944
COLUMBIA, SOUTH CAROLINA 29202

PH
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FAX
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bshealy@robinsonlaw.com

**Re: Time Warner Cable Information Services (South Carolina), LLC's
Arbitration Proceedings with Farmers Telephone Cooperative, Inc., Fort
Mill Telephone Co., Home Telephone Co, Inc. and PBT Telecom, Inc.
PSC Docket Nos. 2011-243-C; 2011-244 C; 2011-245-C and 2011-246-C**

Dear Ms. Boyd:

Enclosed for filing on behalf of Time Warner Cable Information Services (South Carolina), LLC, please find the Motion to Shorten the Time for Response to Interrogatories to Farmers, Fort Mill, Home and PBT. By copy of this letter we are serving the same on counsel for the ILECs and the S.C. Office of Regulatory Staff. We respectfully request expedited review of this request from the Hearing Officer. We have received no response from the counsel for the ILECs in regard to whether the ILECs oppose this motion. Should you have any questions, please contact me.

Very truly yours,

ROBINSON, MCFADDEN & MOORE, P.C.

Bonnie D. Shealy

/bds
Enclosures

cc/enc: Hearing Officer Randall Dong (via email)
C. Lessie Hammonds, Esquire (via email & Hand Delivery)
Jeffrey Nelson, Esquire (via email & Hand Delivery)
M. John Bowen, Jr., Esquire (via email & Hand Delivery)
Margaret M. Fox, Esquire (via email & Hand Delivery)
Julie P. Laine, Group Vice President & Chief Counsel - Regulatory (via email)
Maribeth Bailey, Senior Director Interconnection Policy – Regulatory (via email)

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

In the Matter of)	
)	
Petition for Arbitration of Interconnection)	
Agreement between Time Warner Cable)	Docket No. 2011-243-C
Information Services (South Carolina), LLC,)	
doing business as Time Warner Cable and)	
Farmers Telephone Cooperative, Inc.)	

In the Matter of)	
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Petition for Arbitration of Interconnection)	Docket No. 2011-244-C
Agreement between Time Warner Cable)	
Information Services (South Carolina), LLC,)	
doing business as Time Warner Cable and)	
Fort Mill Telephone Company)	

In the Matter of)	
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Petition for Arbitration of Interconnection)	Docket No. 2011-245-C
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doing business as Time Warner Cable and)	
Home Telephone Co., Inc.)	

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doing business as Time Warner Cable and)	
PBT Telecom, Inc.)	

**TIME WARNER CABLE
INFORMATION SERVICES (SOUTH CAROLINA), LLC'S
MOTION TO SHORTEN TIME FOR RESPONSE TO INTERROGATORIES**

Pursuant to 26 S.C. Code Regs. 103-829, 103-833 and other rules of practice and procedure of the Public Service Commission of South Carolina (“Commission”), Time Warner Cable Information Services (South Carolina), LLC, doing business as Time Warner Cable (“Time Warner Cable”), moves to shorten the time for answers and objections to its Interrogatories dated August 9, 2011, and served on counsel for Farmers Telephone Cooperative, Inc. (“Farmers”); Fort Mill Telephone Company (“Fort Mill”), Home Telephone Co., Inc. (“Home”), and PBT Telecom, Inc. (“PBT”) (collectively “ILECs”) on August 9, 2011, on the following grounds:

1. On July 14, 2011, Time Warner Cable attempted to serve the First Set of Interrogatories and First Requests to Admit on counsel for the ILECs and the S.C. Office of Regulatory Staff (“ORS”). The First Set of Interrogatories requested responses within twenty days of service.

2. When the ILECs did not respond after twenty-six days, Time Warner Cable’s request for answers was renewed by letter dated August 9, 2011. See **Exhibit 1**. Later that same day, the ILECs responded that they did not receive the First Set of Interrogatories. See **Exhibit 2**.

3. When Time Warner Cable realized that the First Set of Interrogatories had inadvertently not been served, Time Warner Cable narrowed the interrogatories and served them on the ILECs on August 9, 2011, by email and by hand delivery. Copies of the correspondence and Interrogatories dated August 9, 2011, are attached as **Exhibit 3**.

4. On August 20, 2011, counsel for Time Warner Cable contacted counsel for ORS who indicated that the agency also did not receive the First Set of Interrogatories.

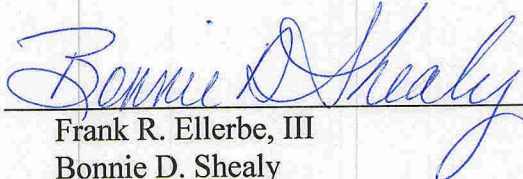
5. The Interrogatories dated August 9, 2011, request that the answers be provided by Thursday, August 25, 2011, which is less than twenty days after service. Since the hearing is scheduled for Monday, August 29, 2011, Time Warner Cable requests permission from the Commission to shorten the time for the ILECs to provide answers to Time Warner Cable. We request that the ILECs provide the answers on August 25, 2011, in order to give the Company adequate time to prepare for the hearing on Monday, August 29, 2011.

6. Time Warner Cable has received no response from counsel for the ILECs in regard to whether the ILECs oppose this request.

Dated this 10th day of August, 2011.

ROBINSON, MCFADDEN & MOORE, P.C.

By



Frank R. Ellerbe, III
Bonnie D. Shealy
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Telephone: (803) 779-8900
fellerbe@robinsonlaw.com
bshealy@robinsonlaw.com

Attorneys for Time Warner Cable Information Services,
(South Carolina), LLC

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EXHIBIT 1

August 9, 2011

VIA EMAIL AND HAND DELIVERY

M. John Bowen, Jr., Esquire
Margaret M. Fox, Esquire
McNair Law firm, P.A.
1221 Main Street, Suite 1800
Columbia, SC 29021

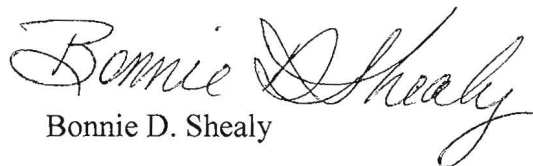
**Re: Time Warner Cable Information Services (South Carolina), LLC's
Interconnection Agreement with Farmers Telephone Cooperative, Inc., Fort
Mill Telephone Co., Home Telephone Co, Inc. and PBT Telecom, Inc.
PSC Docket Nos. 2011-243-C; 2011-244 C; 2011;245-C and 2011-246-C**

Dear John and Peg:

We are writing to follow up on the answers to Time Warner Cable's First Set of Interrogatories to Farmers Telephone Cooperative, Inc., Fort Mill Telephone Co., Home Telephone Co., Inc. and PBT Telecom, Inc. served on you on July 14, 2011. The answers were due last Wednesday, August 3, 2011. Please send us your responses on or before Friday, August 12, 2011, in order to avoid our having to file a motion to compel on Monday.

Very truly yours,

ROBINSON, MCFADDEN & MOORE, P.C.


Bonnie D. Shealy

/bds

Enclosures

cc/enc:

Jeffrey Nelson, ORS Staff Attorney (via email & U.S. Mail)
C. Lessie Hammonds, ORS Staff Attorney (via email & U.S. Mail)
Julie P. Laine, Group Vice President & Chief Counsel - Regulatory (via email)
Maribeth Bailey, Senior Director Interconnection Policy – Regulatory (via email)

Bonnie D. Shealy

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PBT Telecom, Inc.)	

EXHIBIT 2

August 9, 2011

M. John Bowen, Jr.

jbowen@mcnair.net
T (803) 799-9800
F (803) 753-3219

Via E-mail and U. S. Postal Service

Frank R. Ellerbe, III, Esquire
Bonnie D. Shealy, Esquire
Robinson, McFadden & Moore, P.C.
Post Office Box 944
Columbia, South Carolina 29202

Re: Petition for Arbitration of Interconnection Agreement between Time Warner Cable Information Services (South Carolina), LLC d/b/a Time Warner Cable and Farmers Telephone Cooperative, Inc.; Fort Mill Telephone Company d/b/a Comporium Communications; Home Telephone Company, Inc.; and PBT Telecom, Inc.

Dear Frank and Bonnie

I am writing in response to your letter dated August 9, 2011 regarding the discovery request directed to our clients (the "RLECs") that you served on July 14, 2011 on behalf of Time Warner Cable Information Services (South Carolina), LLC ("Time Warner") in the above-referenced dockets.

Your letter states that we did not respond to Time Warner's First Set of Interrogatories, which you say were due on August 3, 2011. Attached is a copy of what we received from you on July 14, 2011. The discovery in question consists entirely of Requests for Admission. The discovery request itself does not specify a time for response. However, it expressly states that it was served pursuant to Rules 26 and 36 of the S.C. Rules of Civil Procedure and 26 S.C. Regs. 103-835. We plan to respond to the discovery request on August 15, 2011, in accordance with your request and with applicable rules.

26 S.C. Regs. 103-835 provides that the S. C. Rules of Civil Procedure govern all discovery matters not covered in Commission Regulations. Commission Regulations do not address Requests for Admission. Therefore, because you did not specify a time for response and the Commission Regulations do not address Requests for Admission, we looked to Rule 36, SCRCF – the rule you cited in your discovery request. Rule 36, SCRCF, provides that parties have thirty (30) days in which to respond to Requests for Admission ("The matter is admitted unless, within 30 days after service of the request, or within such shorter or longer time as the court may allow or as stipulated in writing by the parties pursuant to Rules 29 and 6(b), the party to whom the request is directed

McNair Law Firm, P. A.
1221 Main Street
Suite 1600
Columbia, SC 29201

Mailing Address
Post Office Box 11390
Columbia, SC 29211

mcnair.net

Frank R. Ellerbe, III, Esquire
Bonnie D. Shealy, Esquire
August 9, 2011
Page 2

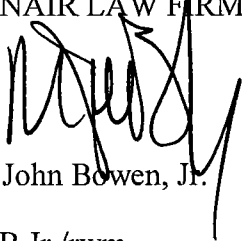
MCNAIR
ATTORNEYS

serves upon the party requesting the admission a written answer or objection addressed to the matter") Therefore, as stated above, we have calendared August 15 as the due date for these responses, and that is when we plan to respond.

If Time Warner intended to serve a set of interrogatories along with the Requests for Admission, we did not receive them. We have reviewed our files, and the attached is the only pleading we have received with respect to discovery.

Sincerely,

McNAIR LAW FIRM, P.A.

A handwritten signature in black ink, appearing to read "M. John Bowen, Jr.", written over the printed name.

M. John Bowen, Jr.

MJB,Jr./rwm

cc: C. Lessie Hammonds, Esquire, ORS
Jeffrey M. Nelson, Esquire, ORS

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EXHIBIT 3

Bonnie D. Shealy

1901 MAIN STREET, SUITE 1200
POST OFFICE BOX 944
COLUMBIA, SOUTH CAROLINA 29202

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(803) 779-8900 | (803) 227-1102 *direct*

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August 9, 2011

VIA EMAIL AND HAND DELIVERY

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Margaret M. Fox, Esquire
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1221 Main Street, Suite 1800
Columbia, SC 29021

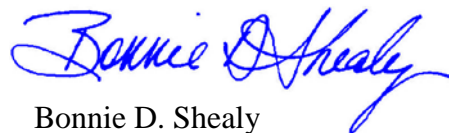
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PSC Docket Nos. 2011-243-C; 2011-244 C; 2011;245-C and 2011-246-C**

Dear John and Peg:

Enclosed please find another copy of our cover letter and certificate of service dated July 14, 2011. Since we have conflicting records regarding service of the First Set of Interrogatories and since your testimony answers some of the questions posed, we have reduced the number of interrogatories to your clients. Since the hearing is scheduled for August 29, 2011, pursuant to 26 S.C. Regs. 103-833(B), we intend to request that the hearing officer allow us to request answers to the enclosed set of interrogatories by August 25, 2011. Please let us know if you oppose this request.

Very truly yours,

ROBINSON, MCFADDEN & MOORE, P.C.



Bonnie D. Shealy

/bds

Enclosures

cc/enc: C. Lessie Hammonds, Esquire (via email & hand delivery)
Julie P. Laine, Group Vice President & Chief Counsel - Regulatory (via email)
Maribeth Bailey, Senior Director Interconnection Policy – Regulatory (via email)

July 14, 2011

VIA HAND DELIVERY

M. John Bowen, Jr., Esquire
Margaret M. Fox, Esquire
McNair Law firm, P.A.
1221 Main Street, Suite 1800
Columbia, SC 29021

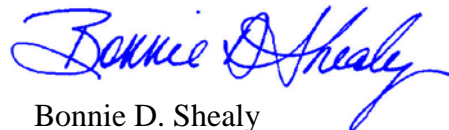
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Dear John and Peg:

Enclosed please find Time Warner Cable's First Set of Interrogatories and First Requests to Admit to Farmers Telephone Cooperative, Inc., Fort Mill Telephone Co., Home Telephone Co., Inc. and PBT Telecom, Inc.

Very truly yours,

ROBINSON, MCFADDEN & MOORE, P.C.


Bonnie D. Shealy

/bds

Enclosures

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Julie P. Laine, Group Vice President & Chief Counsel - Regulatory (via email)
Maribeth Bailey, Senior Director Interconnection Policy – Regulatory (via email)

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CERTIFICATE OF SERVICE

This is to certify that I, Leslie L. Allen, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below
TIME WARNER CABLE'S FIRST SET OF INTERROGATORIES AND FIRST

REQUESTS TO ADMIT TO FARMERS TELEPHONE COOPERATIVE, INC.; FORT MILL TELEPHONE COMPANY; HOME TELEPHONE CO., INC.; AND PBT TELECOM, INC. in the foregoing matter by causing a copy of same to be hand delivered as follows:

M. John Bowen, Jr., Esquire
Margaret M. Fox, Esquire
McNair Law Firm, P.A.
1221 Main Street, Suite 1800
Columbia, SC 29201

C. Lessie Hammonds, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

Dated at Columbia, South Carolina this 14th day of July, 2011.

A handwritten signature in cursive script, appearing to read "Leslie Allen", written in dark ink.

Leslie L. Allen

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**TIME WARNER CABLE'S INTERROGATORIES
DATED AUGUST 9, 2011
TO FARMERS TELEPHONE COOPERATIVE, INC.;
FORT MILL TELEPHONE COMPANY; HOME TELEPHONE CO., INC.;
AND PBT TELECOM, INC.**

Pursuant to 26 S.C. Regs. 103-833 and other applicable rules of practice and procedure of the Public Service Commission of South Carolina (“Commission”), Time Warner Cable Information Services (South Carolina), LLC, d/b/a Time Warner Cable (“Time Warner Cable” or “Applicant”) requests that Farmers Telephone Cooperative, Inc. (“Farmers”), Fort Mill Telephone Company (“Fort Mill”), Home Telephone Co., Inc. (“Home”), and PBT Telecom, Inc. (“PBT”) (collectively “ILECs”) respond to the following interrogatories on or before August 25, 2011.

INTERROGATORY NO. 1-1

Do the ILECs’ ICAs with Sprint contain the following provision in General Terms and Conditions, Section 1.2:

ILEC has no obligation to establish interconnection service arrangements to enable CLEC to solely exchange Information Services traffic. CLEC agrees that it is requesting and will use this arrangement for the primary purposes of exchanging Telecommunications Traffic, whether originated by CLEC or a Last Mile Provider, and that any exchange of Information Service traffic will be incidental to the Parties’ exchange of Telecommunications Traffic. The FCC has not determined whether VoIP or IP-Enabled Traffic is a Telecommunications Service or an Information Service. For purposes of this Agreement, VoIP or IP-Enabled Traffic shall be treated as Telecommunications Service voice traffic. If the FCC determines that any type of VoIP or IP-Enabled Traffic is not subject to interconnection requirements that are the same as those applicable to Telecommunications Services in all material respects, the terms of this Agreement shall remain in effect until such time as this Agreement is modified under the change in law provisions of Section 28 of the General Terms and Conditions of this Agreement.

If your answer is yes, please provide the following information:

- a. For each ILEC, describe in detail any problems that the ILEC has had as a result of Sprint’s provision of wholesale services to Time Warner Cable to provide its Digital Phone (now known as “Digital Home Phone”) services.
- b. identify all witnesses who will testify about any such problems, and
- c. identify all documents concerning or related to any such problems.

INTERROGATORY NO. 1-2

Do the ILECs' ICAs with Sprint address where the Point of Interconnection ("POI") shall be in order for the Parties to exchange Local/EAS Traffic and ISP-Bound Traffic over Direct Interconnection Facilities? If so,

- a. state with specificity any problem or issue that has arisen as a result of the POI with Sprint;
- b. identify all witnesses who will testify about any problems identified in subsection (a);
- c. If you contend that there will be a POI issue or problem with Time Warner Cable, describe with specificity each fact or reason supporting that contention;
- d. identify all witnesses who will testify about any issues or problems or facts or reasons supporting the contention identified in subsection (c); and
- c. identify all documents concerning or related to the answers in (a) through (d).

INTERROGATORY NO. 1-3

Since Time Warner Cable began offering services in each ILEC's service area, do you contend that there have been complaints filed or actions initiated by the Commission or the Office of Regulatory Staff ("ORS") alleging that traffic to the ILEC was improperly identified? If so,

- a. state with specificity each fact or reason supporting such contention;
- b. identify all witnesses who will testify about such facts or reasons, and
- c. identify all documents concerning or related to such contention.

INTERROGATORY NO. 1-4

Since Time Warner Cable began offering services in each ILEC's service area, do you contend that there have been any complaints filed or actions initiated by the Commission or ORS alleging that Sprint and/or Time Warner Cable did not pay appropriate compensation for interconnected traffic? If so,

- a. state with specificity each fact or reason supporting such contention;
- b. identify all witnesses who will testify about such facts or reasons, and
- c. identify all documents concerning or related to such contention.

INTERROGATORY NO. 1-5

Since Time Warner Cable began offering services in each ILEC's service area, do you contend that there have been any complaints filed or actions initiated by the Commission or ORS alleging that Time Warner Cable and/or Sprint did not appropriately pay their S.C. Universal Service Fund or any other regulatory assessments? If so,

- a. state with specificity each fact or reason supporting such contention;
- b. identify all witnesses who will testify about such facts or reasons, and
- c. identify all documents concerning or related to such contention.

INTERROGATORY NO. 1-6

Since Time Warner Cable began offering services in each ILEC's service area, do you contend that there have been any complaints filed or actions initiated by the Commission or ORS alleging Time Warner Cable and/or Sprint did not assign telephone numbers within their associated rate center boundaries? If so,

- a. state with specificity each fact or reason supporting such contention;
- b. identify all witnesses who will testify about such facts or reasons, and
- c. identify all documents concerning or related to such contention.

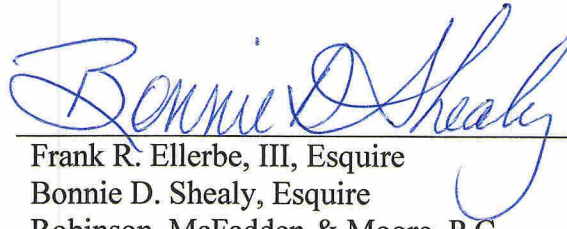
INTERROGATORY NO. 1-7

Do you have any information that suggests that Time Warner Cable or its affiliates are violating any applicable rules and/or regulations concerning interconnection arrangements in other states? If so,

- a. state with specificity each fact or reason supporting such contention;
- b. identify all witnesses who will testify about such facts or reasons, and
- c. identify all documents concerning or related to such contention.

Dated this 9th day of August, 2011.

ROBINSON, MCFADDEN & MOORE, P.C.



Frank R. Ellerbe, III, Esquire
Bonnie D. Shealy, Esquire
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Telephone: 803-779-8900
Fax: 803-252-0724

Attorneys for Time Warner Cable Information
Services, (South Carolina), LLC

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PBT Telecom, Inc.)	

CERTIFICATE OF SERVICE

This is to certify that I, Matt Hartman, a courier with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below

TIME WARNER CABLE'S INTERROGATORIES DATED AUGUST 9, 2011 in the
dockets referenced above by hand delivering copies of same to the following:

M. John Bowen, Jr., Esquire
Margaret M. Fox, Esquire
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Dated at Columbia, South Carolina this 9th day of August, 2011.



Matt Hartman

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

In the Matter of)	
)	
Petition for Arbitration of Interconnection)	
Agreement between Time Warner Cable)	Docket No. 2011-243-C
Information Services (South Carolina), LLC,)	
doing business as Time Warner Cable and)	
Farmers Telephone Cooperative, Inc.)	

In the Matter of)	
)	
Petition for Arbitration of Interconnection)	Docket No. 2011-244-C
Agreement between Time Warner Cable)	
Information Services (South Carolina), LLC,)	
doing business as Time Warner Cable and)	
Fort Mill Telephone Company)	

In the Matter of)	
)	
Petition for Arbitration of Interconnection)	Docket No. 2011-245-C
Agreement between Time Warner Cable)	
Information Services (South Carolina), LLC,)	
doing business as Time Warner Cable and)	
Home Telephone Co., Inc.)	

In the Matter of)	
)	
Petition for Arbitration of Interconnection)	Docket No. 2011-246-C
Agreement between Time Warner Cable)	
Information Services (South Carolina), LLC,)	
doing business as Time Warner Cable and)	
PBT Telecom, Inc.)	

CERTIFICATE OF SERVICE


This is to certify that I, Toni C. Hawkins, a paralegal with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below
TIME WARNER CABLE'S MOTION TO SHORTEN TIME FOR RESPONSE TO

INTERROGATORIES in the dockets referenced above by causing copies of same to be hand delivered via courier and via electronic mail to the following:

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Dated at Columbia, South Carolina this 10th day of August, 2011.



Toni C. Hawkins